

United States District Court for the District of Utah

SCOTT D PETTINGILL JR
Plaintiff

vs.

NORTHERN LEASING SYSTEMS INC.
Defendant[s]

FILED
U.S. DISTRICT COURT
CASE No.: _____
2013 APR 17 1:35
Judge: _____
DISTRICT OF UTAH
BY: _____
DEPUTY CLERK

COMPLAINT
TRIAL BY JURY DEMANDED

COMPLAINT FOR VIOLATIONS OF FDCPA

Case: 1:13-cv-00060
Assigned To : Furse, Evelyn J.
Assign. Date : 4/17/2013
Description: Pettingill v. Northern
Leasing Systems

JURISDICTION

1. This court has jurisdiction under 15 U.S.C. §1692 and 28 U.S.C. §1331.

PARTIES

2. The Plaintiff in this lawsuit is Scott-D.: Pettingill©™, a natural person, who resides in Box Elder County, Utah.
3. The Defendant in this lawsuit is Northern Leasing Systems Inc. , who's office is at 1100 132 W. 31st Street, 14th Fl. New York, NY 10001.
4. At all times Northern Leasing Systems Inc. and their Attorneys were and are operating as a debt collector as defined by 15 U.S.C. § 1692a [6].

VENUE

5. The occurrences which give rise to this action occurred in Box Elder, Utah.
6. Venue is proper in the District of Utah.

STATEMENT OF FACTS

7. On October 11th, 2012 filed a debt collection lawsuit against the Plaintiff in the Civil Court of the City of New York, County of New York.
8. Plaintiff resides in Box Elder County, Utah.
9. Northern Leasing Systems Inc nor their alleged attorneys are not a licensed debt collection agency in the State of Utah.

**COUNT 1
VIOLATION OF THE FAIR DEBT PRACTICES ACT**

10. Plaintiff repeats, re-alleges and incorporates paragraphs 1 through 9 above.
11. Northern Leasing Systems Inc. and it's alleged attorneys violated the Fair Debt Collection Practices Act by filing a lawsuit against Plaintiff, thereby conducting a collection agency, without being Licensed in the State of Utah and in violation of 15 U.S.C. § 1692d, 15 U.S.C. § 1692e and 15 U.S.C. § 1692f.
12. As a result of these violations of the Fair Debt Collection Practices Act, Northern Leasing Systems Inc., et al is liable to Plaintiff for his actual damages, statutory damages, punitive damages, costs, applicable attorney fees and all other appropriate relief.

**COUNT 2
VIOLATION OF THE FAIR DEBT PRACTICES ACT**

13. Plaintiff repeats, re-alleges and incorporates paragraphs 1 through 12 above.
14. Northern Leasing Systems Inc., et al violated the Fair Debt Collection Practices Act by filing a lawsuit against Plaintiff outside the judicial district where he lives in violation of 15 U.S.C. § 1692i.
15. As a result of these violations of the Fair Debt Collection Practices Act Northern Leasing Systems Inc., et al is liable to Plaintiff for her actual damages, statutory damages, punitive damages, costs, applicable attorney fees and all other appropriate relief.

COUNT 3
VIOLATION OF THE FAIR DEBT PRACTICES ACT

16. Northern Leasing Systems Inc by and thru it's alleged attorneys violated the Fair Debt Collection Practices Act by filing an illegal lawsuit against Plaintiff in violation of 15 U.S.C. § 1692d, 15 U.S.C. § 1692e and 15 U.S.C. § 1692f.

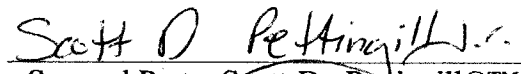
17. As a result of these violations of the Fair Debt Collection Practices Act, Northern Leasing Systems, et al is liable to Plaintiff for his actual damages, statutory damages, punitive damages, costs, applicable attorney fees and all other appropriate relief in excess of \$100.000 U.S. Dollars.

WHEREFORE, Plaintiff respectfully requests that the Court enter judgment in his favor and against Defendants in an amount that will compensate him for his actual damages, statutory damages, punitive damages, costs, applicable attorney fees and all other appropriate relief.

DEMAND FOR TRIAL BY JURY

Plaintiff hereby demands a trial by jury of all issues as triable as a matter of law.

Respectfully submitted,



By: Secured Party, Scott-D.: Pettingill©™

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 16, 2013, a copy of the foregoing Plaintiff's Complaint was sent by Certified U.S. Mail using the Number: 7012 1640 0000 6862 1240 mail to Northern Leasing Systems Inc.; 1100 132 W. 31ST ST., 14TH Floor, New York, New York [10001].

Also, (3) sets of copies were sent to United State District Court, District of Utah; **DISTRICT OF UTAH, 350 South Main Street, Rm. 150 Salt Lake City, Utah 84101-2180**, with prepaid envelope addressed to Northern Leasing System, 1100 132 W. 31ST St. 14th floor, New York, New York [10001] to Issue and Serve Summons in the above said Cause.

Respectfully Submitted,

Scott D Pettingill L.S. --In Propria Persona
Secured Party, Scott-D: Pettingill©
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United States District Court for the District of Utah

SCOTT D PETTINGILL JR
Plaintiff

vs.

NORTHERN LEASING SYSTEMS INC.
Defendant[s]

CASE No.: _____

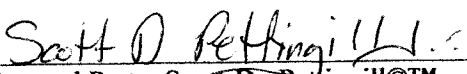
Judge: _____

PRAECIPE FOR SUMMONS

TO THE COURT CLERK:

Issue and serve summons in the above numbered case to: Defendant, Northern Leasing Systems Inc. at 1100
132 W. 31st Street, 14th Fl. New York, NY 10001.

Respectfully submitted,


By: Secured Party, Scott-D.: Pettingill©™
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